



## FACT

### WHAT DOES VALIDUS DO WITH YOUR PERSONAL INFORMATION?

#### Why

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

The collection of the personal information of California state residents is regulated by the California Consumer Privacy Act ("CCPA"). CCPA grants California residents the rights to access their personal information, have it deleted, and to opt out of its "sale." Please see additional information relevant to CCPA, below under the "California Consumers" section. Please note that while California residents have the right to the deletion of their information, as a regulated financial entity, Validus is not always able to ensure full erasure, pursuant to recordkeeping requirements. As such, where this is not possible, Validus will instead take "good-faith" measures to comply with the rule by restricting such information and making it accessible only to the Chief Compliance Officer, who will only access or share it as required to comply with a request or investigation by regulators or law enforcement.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Name and address
- Social Security number
- Account numbers, balances, and transaction history
- IP address, browser type, and operating system. We accomplish this through the use of "cookies." No personal information is stored in our cookies. For more information about cookies and how to disable them please visit <http://www.allaboutcookies.org> and review our [cookie policy](#)
- email address

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Validus chooses to share; and whether you can limit this sharing.

Information Collected by Cookies and Similar Tracking Technologies: We use cookies, web beacons (also known as "tracking pixels") and similar tracking technologies to collect information about you when you interact with our websites or emails, including information about your browsing and purchasing behavior. We may combine this information with other information we collect about you and use it for various purposes, such as improving our websites and your online experience, understanding which areas and features of our sites are popular, counting visits, tailoring our communications with you, determining whether an email has been opened and links within the email have been clicked, and for other internal business purposes. For more information about how we use cookies, please see the cookie policy.



Reasons we can share your personal information	Does Validus share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> To Opt Out</li> <li><input type="checkbox"/> Email us at: <a href="mailto:compliance@validusgrowth.com">compliance@validusgrowth.com</a></li> <li><input type="checkbox"/> Visit Validus’ “Do Not Sell My Personal Information” webpage (CA residents only)</li> </ul> <p>Please note:</p> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
<b>California Consumers</b>	<p>Relative to information collected in the past 12 months, CA resident consumers have the following additional rights under the California Consumer Privacy Act (“CCPA”):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Right to opt out</li> <li><input type="checkbox"/> Right to access information</li> <li><input type="checkbox"/> Right to delete personal information</li> </ul> <p>In addition, please see Validus’s “Do Not Sell My Personal Information” page on our website, located here: <a href="http://www.validusgrowth.com">www.validusgrowth.com</a></p>

**Questions?**

E-mail: [compliance@validusgrowth.com](mailto:compliance@validusgrowth.com) Call: 858.410.1410



## Section 2

### Who we are

**Who is providing this notice?**

This form is being provided by Validus Growth Investors, LLC

### What we do

**How does Validus protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

When you access our Account holder areas, you are required to provide your username and your password. Do not share your password and change it frequently.

**How does Validus collect my personal information?**

We collect your personal information, for example, when you

- open an account
- provide account information
- direct us to sell securities
- direct us to buy securities

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account unless you tell us otherwise

**Use of Google Analytics?**

We use cookies to collect data through the use of Google Analytics.

For more information, please review our cookie policy, and reference "How Google uses data when you use our partners' sites or apps" located at: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

### Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Currently, no affiliated entities



#### **Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Validus does not share with nonaffiliates so they can market to you.
- We are using the services of our trusted service provider in order to help us prevent online frauds. Our service provider may use and process your personal information in accordance with applicable privacy and data protection laws. You can read about the ways by which our service provider may use and process your personal information in this address <https://www.forter.com/service-privacy-policy/>

### **Section 3**

#### **Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- Validus does not jointly market